

To: Laycock, Kelly[Laycock.Kelly@epa.gov]
From: Hughes, Travis G CIV USARMY CESAC (US)
Sent: Tue 1/31/2017 4:57:35 PM
Subject: RE: FW: Caton Creek follow-up on comment 8 and 10

Hey man,
I need to give you a heads up on I-73. Congressman Rice or his staff may be calling you re: mitigation plan. Call me at 843-296-8419.
Thanks,
Travis

-----Original Message-----

From: Laycock, Kelly [mailto:Laycock.Kelly@epa.gov]
Sent: Wednesday, January 25, 2017 9:21 AM
To: Hughes, Travis G CIV USARMY CESAC (US) <Travis.G.Hughes@usace.army.mil>
Subject: [EXTERNAL] RE: FW: Caton Creek follow-up on comment 8 and 10

Thursday at around 930 works for me, just give me a call at the office when you are ready.

Kelly Laycock
Wetlands Regulatory Section
U.S. Environmental Protection Agency
61 Forsyth St.
Atlanta GA, 30303
phone 404 562 9132

-----Original Message-----

From: Hughes, Travis G CIV USARMY CESAC (US) [mailto:Travis.G.Hughes@usace.army.mil]
Sent: Wednesday, January 25, 2017 9:16 AM
To: Laycock, Kelly <Laycock.Kelly@epa.gov>
Subject: RE: FW: Caton Creek follow-up on comment 8 and 10

Hey man,
Yesterday got away from me. I will be in the car a good bit today and will have some time around 9:30 tomorrow.
Thanks,
Travis

-----Original Message-----

From: Laycock, Kelly [mailto:Laycock.Kelly@epa.gov]
Sent: Monday, January 23, 2017 10:46 AM
To: Hughes, Travis G CIV USARMY CESAC (US) <Travis.G.Hughes@usace.army.mil>
Subject: [EXTERNAL] RE: FW: Caton Creek follow-up on comment 8 and 10

Travis,

I'd be happy to discuss. I should be in the office 900-530 tomorrow (Tuesday) and Thursday. Let me know what works for you.

Thanks,

Kelly Laycock

Wetlands Regulatory Section

U.S. Environmental Protection Agency

61 Forsyth St.

Atlanta GA, 30303

phone 404 562 9132

From: Hughes, Travis G CIV USARMY CESAC (US) [mailto:Travis.G.Hughes@usace.army.mil]
Sent: Monday, January 23, 2017 10:29 AM
To: Laycock, Kelly <Laycock.Kelly@epa.gov>
Subject: Fwd: FW: Caton Creek follow-up on comment 8 and 10

Hey Kelly,

I would like to discuss your comments below if you have some time this week.

Thanks,

Travis

From: "Gentry, Dana K CIV USARMY CESAC (US)"
Sent: Monday, January 23, 2017 8:15 AM
To: "Williams, Elizabeth G CIV USARMY CESAC (US)", "Hughes, Travis G CIV USARMY CESAC (US)"
Subject: FW: Caton Creek follow-up on comment 8 and 10

Good morning Elizabeth and Travis,

I want to close the loop on the two outstanding comments from the Monday, January 9th Caton Creek meeting. I spoke with Kelly, his response is in the email below.

8. Page 44 Hydraulics: Please note that the guidelines stipulate "following 5 years of monitoring and two bankfull events...". Please revise the language in the DMBI to reflect this requirement.

- We request clarification on how this is not already addressed in the write up.

- It appears that this item was inadvertently missed for discussion during the meeting. Clarification from the USACE on this item would be helpful.

- The Corps suggests adding the word "minimum", monitoring is for a minimum of 5-years.

10. Page 48 Hydrology/Hydrologic: "Enhancement efforts will be considered successful if the culverts are installed." Please provide baseline data which documents hydrological impairment, monitoring protocol, and propose environmental success criteria that incrementally support the banks movement toward success.

- A discussion was also held on comments from EPA regarding hydrology monitoring in wetlands that the Bank is claiming as restored. It appears EPA is suggesting monitoring of groundwater levels in areas where the existing channel of Caton Creek is to be filled and where areas of the existing soil road are to be removed. In both situations the mitigation plan is that these areas will be graded to, or slightly below the elevation of adjacent jurisdictional wetlands within Caton Creek's floodplain. The DMBI does not propose hydrology monitoring (i.e. restored hydrology is assumed) because the graded areas are within or immediately adjacent to the limits of existing, jurisdictional wetlands (as detailed within the Preliminary Jurisdictional mapping limits). The USACE indicated that they would review this item and potentially discuss with EPA the merits of hydrology monitoring in these areas. The USACE will inform HDR|ICA of their opinion on this item.

- Additionally, a discussion was held regarding a comment presented by SCDNR in relation to the Bank requesting wetland restoration credits within portions of the existing channel of Caton Creek that are proposed to be fully graded to adjacent wetland elevations (i.e. some pockets of the existing channel may be left "open" and not filled to match ground elevations of the existing adjacent wetlands). It appears that SCDNR will not allow for wetland restoration credits within portions of the existing Caton Creek channel that are not fully filled and graded to adjacent wetland elevations (i.e. SCDNR appears to define areas of Caton Creek not fully graded to

adjacent contours as "open waters"). HDR|ICA suggests that these areas are similar in nature to meander scrolls within the floodplain that add diversity to the entire ecosystem; therefore, wetland credits would be warranted. The USACE suggested adding language in MBI that discusses how the sections of ditched Caton Creek that we will be leaving as partially filled are similar to relic meander scrolls that are currently found throughout the floodplain that pool water during the wet season and after rain events. Additionally, the USACE will take this question into consideration and provide feedback as to their opinion.

- Please see Kelly's response below. Kelly and I are on the same page with this.

Please let me know if you would like me to send the Caton Creek team the follow-up email.

Best, Dana.

From: Laycock, Kelly [mailto:Laycock.Kelly@epa.gov]
Sent: Friday, January 20, 2017 3:23 PM

To: Gentry, Dana K CIV USARMY CESAC (US) <Dana.K.Gentry@usace.army.mil
<mailto:Dana.K.Gentry@usace.army.mil> >
Subject: [EXTERNAL] RE: Caton Creek

Dana,

Per our conversation:

The EPA does not believe wetland hydrology should be assumed in restoration areas where roads are removed or abandoned channel is filled. As for the roads, the sponsor says it will be graded at or below wetland elevation. If grading is too far above or below grade, you may have non-wetland or open water respectively. If the plan is successful this should not be a problem but that's exactly what monitoring plans are for, to prove the plan is successful. The EPA will continue to push for hydrologic monitoring and performance standards as required in the 2008 Mitigation Rule.

Further, on our discussion of burning not being feasible in pine flatwood habitat, if these areas cannot be burned pine flatwood habitat obviously can't be restored. As for changing the planned wetland type, wetland restoration is exactly that, the restoration of the historic wetland habitat that would have been present and suitable for the site. Target wetland type should not be changed based on a sponsor's inability to perform the proper restoration activities. If proper restoration activities are not feasible, it would appear to be poor site selection.

Kelly Laycock

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